



1720 Sycamore Road
Montoursville, PA 17754

October 25, 2019

Mr. Muhammad Zaman
Regional Air Quality Program Manager
Pennsylvania Department of Environmental Protection
North-central Regional Office
208 West Third St.
Suite 101
Williamsport, PA 17701

VIA CERTIFIED MAIL, RETURN RECEIPT

**Re: Submittal of 40 CFR §60.5410a, 40 CFR §60.5415a, and 40 CFR §60.5420a Annual Report / Initial Notification of Compliance Demonstration for Gas Well Affected Facilities Subject to 40 CFR Part 60, Subpart OOOOa
For the Period of August 3, 2018 through August 2, 2019
Chief Oil and Gas, LLC**

Dear Mr. Zaman:

Chief Oil and Gas, LLC (Chief) is submitting the enclosed annual report / initial notification of compliance demonstration for gas well affected facilities subject to the requirements of 40 CFR Part 60, Subpart OOOOa – Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015 (Subpart OOOOa). Chief is submitting this report for the compliance period of August 3, 2018 through August 2, 2019 in accordance with the requirements of 40 CFR §60.5410a(a), 40 CFR §60.5415a, and 40 CFR §60.5420a(b). Pursuant to 40 CFR §60.5420a(b), annual reports are due no later than the same date each year as the initial annual report. The initial annual report for Chief's affected gas well facilities was submitted on October 30, 2017. Therefore, subsequent annual reports are due no later than October 30th of each year. In addition, this submittal includes the initial annual report and initial notification of compliance demonstration for newly subject gas well facilities. This submittal was prepared by ALL4 LLC on behalf of Chief.

If you have any questions or require additional information, please contact me at (570) 651-9825 or at tberkey@chiefog.com.

Sincerely,
Chief Oil and Gas, LLC

Tyler Berkey
Regulatory Coordinator

Enclosures

Cc: Ms. Cristina Fernandez – U.S. EPA, Region III | Director, Air Protection Division

CHIEF OIL AND GAS, LLC (CHIEF)

**40 CFR PART 60, SUBPART OOOOa –
STANDARDS OF PERFORMANCE FOR CRUDE OIL AND NATURAL GAS
FACILITIES FOR WHICH CONSTRUCTION, MODIFICATION OR
RECONSTRUCTION COMMENCED AFTER SEPTEMBER 18, 2015**

ANNUAL REPORT / INITIAL NOTIFICATION OF COMPLIANCE DEMONSTRATION

40 CFR Part 60, Subpart OOOOa (Subpart OOOOa) initial compliance demonstration requirements, continuous compliance demonstration requirements, and ongoing reporting requirements are codified at 40 CFR §60.5410a, 40 CFR §60.5415a, and 40 CFR §60.5420a, respectively. Applicability determinations for these requirements to Chief's natural gas production well sites and associated compliance demonstrations are provided hereafter.

I. Notifications in accordance with 40 CFR §60.5410a(a)(1), as detailed in 40 CFR §60.5420a(a)(2)

40 CFR §60.5420a(a)(2)(i) requires owner/operators of a gas well affected facility to submit notification to the Administrator that lists the anticipated date of the well completion operation. This notification must be submitted to the Administrator no later than two days prior to the commencement of each well completion operation. Chief has constructed Subpart OOOOa gas well affected facilities during the reporting period and the gas well affected facilities are subject to the notification requirement of 40 CFR §60.5420a(a)(2)(i).

Chief's 40 CFR Part 60, Subpart OOOOa gas well affected facilities are also subject to Pennsylvania's Act 13 of 2012 (Act 13), which became effective February 14, 2012. Pursuant to §3211(f)(2) of Act 13, Chief provides 24 hours' notice to the Pennsylvania Department of Environmental Protection (PADEP) prior to cementing all casing strings, conducting pressure tests of the production casing, stimulation, and abandoning or plugging an unconventional well, via the PADEP online stimulation notification report. Furthermore, Chief provides a completion report to PADEP within 30 days after completion of the well (i.e., when the well is capable of production) in accordance with §3222(b)(3) of Act 13. Pursuant to 40 CFR §60.5420a(a)(2)(ii), Chief has met the advanced notification requirements of 40 CFR §60.5420a(a)(2)(i) by having met the advanced notification requirements of Pennsylvania Act 13.

Records of all electronic Act 13 Stimulation notifications are maintained by Chief. Copies of these notifications are available for inspection upon request. Chief will continue submitting notifications in accordance with Pennsylvania's Act 13 and Pennsylvania Air Quality Permit Exemptions (i.e., Document No. 275-2101-003, Exemption No. 38a, 38b, or 38c), as applicable.

II. Reporting in accordance with 40 CFR §60.5410a(a)(2) and 40 CFR §60.5415a(a), as detailed in 40 CFR §60.5420a(b)

40 CFR §60.5420a(b) requires owner/operators to submit annual reports providing information specified at 40 CFR §§60.5420a(b)(1) through (8) and (12). One report may be submitted for multiple affected facilities.

In accordance with 40 CFR §60.5420a(b)(11), Subpart OOOOa reports must be submitted via the U.S. Environmental Protection Agency (U.S. EPA) Compliance and Emissions Data Reporting Interface (CEDRI), unless the reporting form specific to Subpart OOOOa is not available in CEDRI at the time that the report is due. While a draft version of the Subpart OOOOa Annual Report template is available on the U.S. EPA Oil and Natural Gas Industry webpage, the final reporting form template was not available in CEDRI at the time that this report was submitted. Chief understands that facilities are not required to electronically submit the annual report until 90 days after the final template has been made available in CEDRI. Therefore, this report is being submitted in hard-copy to the appropriate delegated authority address.

General Information [40 CFR §60.5420a(b)(1)]

(i) The company name, facility site name associated with the affected facility, US Well ID or US Well ID associated with the affected facility, if applicable, and address of the affected facility or description of the site location/latitude and longitude coordinates of the site:

Company Name and Address:

Chief Oil and Gas, LLC
1720 Sycamore Road
Montoursville, PA 17754
P: 570-651-9825
F: 570-651-9828

(ii) Identification of each affected facility being included in the annual report:

Identification of each gas well affected facility is provided in Table 1 and Table 2, which document the initial annual reporting requirement for newly affected gas well facilities and the subsequent annual reporting requirement for existing gas well facilities, respectively. Other affected facilities include fugitive emissions components associated with each affected gas well facility.

(iii) Beginning and ending dates of the reporting period:

Chief is submitting this report for the period from August 3, 2018 through August 2, 2019.

Table 1
Summary of Affected Gas Well Facilities per 40 CFR §60.5420a(b)
40 CFR §60.5410a(a)(2) Initial Annual Report

| Well Name ^(a) | County | Township | API Number | Latitude | Longitude |
|---------------------------------|---------------|-----------------|-------------------|-----------------|------------------|
| C. Pepper 1H | Bradford | Leroy | 37-015-23410 | 41.660456 | -76.679181 |
| C. Pepper 2H | Bradford | Leroy | 37-015-23411 | 41.660500 | -76.679133 |
| Kaufmann East 4H | Bradford | Colley | 37-015-23371 | 41.562094 | -76.301644 |
| Kaufmann East 5H | Bradford | Colley | 37-015-23374 | 41.562122 | -76.301647 |
| L. Kingsley NE 3H | Bradford | Overton | 37-015-23345 | 41.596942 | -76.581319 |
| L. Kingsley NE 4H | Bradford | Overton | 37-015-23346 | 41.596833 | -76.581306 |
| L. Kingsley NW 1H | Bradford | Overton | 37-015-23343 | 41.596889 | -76.581311 |
| L. Kingsley NW 2H | Bradford | Overton | 37-015-23344 | 41.596997 | -76.581325 |
| L. Kingsley SE 3H | Bradford | Overton | 37-015-23350 | 41.596614 | -76.581281 |
| L. Kingsley SE 4H | Bradford | Overton | 37-015-23348 | 41.596725 | -76.581294 |
| L. Kingsley SW 1H | Bradford | Overton | 37-015-23347 | 41.596778 | -76.581300 |
| L. Kingsley SW 2H | Bradford | Overton | 37-015-23349 | 41.596669 | -76.581286 |
| Mehalick 2H | Sullivan | Cherry | 37-113-20383 | 41.506522 | -76.350547 |
| Raimo 1H | Bradford | Overton | 37-015-23428 | 41.662717 | -76.528256 |
| Raimo 2H | Bradford | Overton | 37-015-23429 | 41.662656 | -76.528131 |
| Raimo East 1H | Bradford | Overton | 37-015-23430 | 41.662603 | -76.528008 |
| Raimo East 2H | Bradford | Overton | 37-015-23431 | 41.662544 | -76.527883 |
| SGL-12 Hardy North 1H | Bradford | Overton | 37-015-23372 | 41.593722 | -76.660172 |
| SGL-12 Hardy SW 2H | Bradford | Overton | 37-015-23373 | 41.593675 | -76.660206 |
| SGL-12 K South 1H | Bradford | Leroy | 37-015-23316 | 41.637956 | -76.711953 |
| SGL-12 L North 4H | Bradford | Leroy | 37-015-23400 | 41.654358 | -76.693203 |
| SGL-12 M North 1H | Bradford | Leroy | 37-015-23401 | 41.654311 | -76.693164 |
| SGL-12 M North 2H | Bradford | Leroy | 37-015-23402 | 41.654267 | -76.693125 |
| SGL-12 N East 1H | Bradford | Leroy | 37-015-23408 | 41.660625 | -76.678994 |
| SGL-12 N East 2H | Bradford | Leroy | 37-015-23409 | 41.660667 | -76.678947 |
| SGL-12 N West 1H | Bradford | Leroy | 37-015-23403 | 41.654406 | -76.693242 |
| SGL-12 N West 2H | Bradford | Leroy | 37-015-23398 | 41.660417 | -76.679231 |
| SGL-12 N West 3H | Bradford | Leroy | 37-015-23399 | 41.660583 | -76.679042 |
| Wissler South 2H | Lycoming | McNett | 37-081-21724 | 41.553333 | -76.823817 |
| Wissler South 3H | Lycoming | McNett | 37-081-21725 | 41.553306 | -76.823856 |

^(a) Attachment A includes records for these newly affected wells.

Table 2
Summary of Affected Gas Well Facilities per 40 CFR §60.5420a(b)
40 CFR §60.5415a(a) Subsequent Annual Report

| Well Name^(a) | County | Township | API Number | Latitude | Longitude |
|--------------------------------|---------------|-----------------|-------------------|-----------------|------------------|
| Ambrosius A-2H | Bradford | Wilmot | 37-015-23296 | 41.592631 | -76.282289 |
| Ambrosius A-3H | Bradford | Wilmot | 37-015-23297 | 41.592631 | -76.282333 |
| Ambrosius B-1H | Bradford | Wilmot | 37-015-23308 | 41.587431 | -76.271219 |
| Ambrosius B-2H | Bradford | Wilmot | 37-015-23309 | 41.587542 | -76.271217 |
| Ambrosius B-3H | Bradford | Wilmot | 37-015-23307 | 41.587486 | -76.271217 |
| Bahl 1H | Sullivan | Forks | 37-113-20346 | 41.564331 | -76.513386 |
| Bahl 2H | Sullivan | Forks | 37-113-20366 | 41.564275 | -76.513406 |
| Bahl 3H | Sullivan | Forks | 37-113-20347 | 41.564219 | -76.513386 |
| Bailey 2H | Bradford | Overton | 37-015-23266 | 41.578192 | -76.585467 |
| Bailey 3H | Bradford | Overton | 37-015-23267 | 41.578167 | -76.585403 |
| Bedford 1H | Sullivan | Elkland | 37-113-20051 | 41.558878 | -76.570500 |
| Bedford 4H | Sullivan | Elkland | 37-113-20048 | 41.558894 | -76.570550 |
| Beirne Green Hills Farms A-1H | Bradford | Wilmot | 37-015-23334 | 41.720053 | -76.412631 |
| Beirne Green Hills Farms A-2H | Bradford | Wilmot | 37-015-23335 | 41.720008 | -76.412672 |
| Beirne Green Hills Farms A-4H | Bradford | Wilmot | 37-015-23336 | 41.720100 | -76.412589 |
| Czop 2H | Sullivan | Fox | 37-113-20352 | 41.570831 | -76.741453 |
| G&S Big Rigger 2H | Sullivan | Cherry | 37-113-20282 | 41.531211 | -76.462975 |
| G&S Big Rigger 3H | Sullivan | Cherry | 37-113-20286 | 41.531222 | -76.462942 |
| G&S Big Rigger 4H | Sullivan | Cherry | 37-113-20285 | 41.531233 | -76.462908 |
| G&S Big Rigger 5H | Sullivan | Cherry | 37-113-20284 | 41.531208 | -76.462894 |
| G&S Big Rigger 6H | Sullivan | Cherry | 37-113-20283 | 41.531197 | -76.462928 |
| Hart North 1H | Sullivan | Elkland | 37-113-20368 | 41.554403 | -76.589192 |
| Hart North 2H | Sullivan | Elkland | 37-113-20349 | 41.554300 | -76.589006 |
| Hart South 1H | Sullivan | Elkland | 37-113-20350 | 41.554344 | -76.588994 |
| Hart South 2H | Sullivan | Elkland | 37-113-20367 | 41.545447 | -76.589236 |
| Hart North 3H | Bradford | Overton | 37-015-23368 | 41.571492 | -76.590842 |
| Hart North 4H | Bradford | Overton | 37-015-23369 | 41.571544 | -76.590861 |
| Hart North 5H | Bradford | Overton | 37-015-23370 | 41.571597 | -76.590881 |
| Hemlock Hunting Club 2H | Sullivan | Elkland | 37-113-20316 | 41.559375 | -76.640056 |
| Hemlock Hunting Club 3H | Sullivan | Elkland | 37-113-20315 | 41.559400 | -76.640039 |
| Hemlock Hunting Club 4H | Sullivan | Elkland | 37-113-20314 | 41.559425 | -76.640022 |
| Hemlock Hunting Club 5H | Sullivan | Elkland | 37-113-20317 | 41.559447 | -76.640006 |
| Hemlock Hunting Club B-1H | Sullivan | Elkland | 37-113-20357 | 41.561667 | -76.631269 |
| Hemlock Hunting Club B-2H | Sullivan | Elkland | 37-113-20364 | 41.562494 | -76.631194 |
| Hurley 2H | Sullivan | Cherry | 37-113-20363 | 41.542317 | -76.403614 |
| Hurley 3H | Sullivan | Cherry | 37-113-20362 | 41.542272 | -76.403569 |
| Hurley B-1H | Sullivan | Cherry | 37-113-20360 | 41.530258 | -76.410953 |
| I. Harvey 1H | Sullivan | Elkland | 37-113-20219 | 41.514494 | -76.679819 |
| I. Harvey 2H | Sullivan | Elkland | 37-113-20220 | 41.514442 | -76.679800 |
| IDC-Innes 4H | Bradford | Leroy | 37-015-23337 | 41.708833 | -76.527022 |
| J. Brown North 2H | Bradford | Troy | 37-015-23255 | 41.783611 | -76.743611 |
| Jacobson 1H | Bradford | Franklin | 37-015-23278 | 41.708833 | -76.527022 |
| Jacobson 2H | Bradford | Franklin | 37-015-23279 | 41.708886 | -76.526997 |
| Kuziak B-3H | Sullivan | Elkland | 37-113-20305 | 41.545897 | -76.694553 |

Table 2
Summary of Affected Gas Well Facilities per 40 CFR §60.5420a(b)
40 CFR §60.5415a(a) Subsequent Annual Report

| Well Name^(a) | County | Township | API Number | Latitude | Longitude |
|--------------------------------|---------------|-----------------|-------------------|-----------------|------------------|
| L&L Construction A-2H | Bradford | Wilmot | 37-015-23281 | 41.586639 | -76.225000 |
| L&L Construction A-3H | Bradford | Wilmot | 37-015-23282 | 41.586664 | -76.224936 |
| Larry Baumunk 1H | Sullivan | Fox | 37-113-20354 | 41.570919 | -76.741542 |
| Lightcap North 1H | Bradford | Overton | 37-015-23366 | 41.571689 | -76.590914 |
| Lightcap North 2H | Bradford | Overton | 37-015-23367 | 41.571731 | -76.590931 |
| Lightcap North BRA 4H | Bradford | Overton | 37-015-23166 | 41.662636 | -76.528328 |
| Martino 1H | Bradford | Albany | 37-015-23264 | 41.562928 | -76.468406 |
| Martino 2H | Bradford | Albany | 37-015-23283 | 41.563022 | -76.468525 |
| Nelson 2H | Sullivan | Forks | 37-113-20377 | 41.550990 | -76.491378 |
| Nelson 3H | Sullivan | Forks | 37-113-20378 | 41.551030 | -76.491364 |
| P. Cullen A-1H | Bradford | Overton | 37-015-22404 | 41.568214 | -76.548722 |
| Raimo 3H | Bradford | Overton | 37-015-23324 | 41.662578 | -76.528203 |
| Raimo 4H | Bradford | Overton | 37-015-23325 | 41.662519 | -76.528078 |
| Raimo East 3H | Bradford | Overton | 37-015-23320 | 41.662461 | -76.527953 |
| Raimo East 4H | Bradford | Overton | 37-015-23321 | 41.564078 | -76.606986 |
| SA Wilson 1H | Bradford | Overton | 37-015-23172 | 41.579361 | -76.569139 |
| Savage 2H | Sullivan | Elkland | 37-113-20379 | 41.564183 | -76.606944 |
| Savage 3H | Sullivan | Elkland | 37-113-20382 | 41.564236 | -76.606925 |
| Savage South 2H | Sullivan | Elkland | 37-113-20380 | 41.564131 | -76.606967 |
| Savage South 3H | Sullivan | Elkland | 37-113-20381 | 41.564131 | -76.606967 |
| SGL-12 A-2H | Bradford | Overton | 37-015-23077 | 41.590975 | -76.675169 |
| SGL-12 A-3H | Bradford | Overton | 37-015-23078 | 41.590981 | -76.675117 |
| SGL-12 A-4H | Bradford | Overton | 37-015-23079 | 41.590989 | -76.675061 |
| SGL-12 A-6H | Bradford | Overton | 37-015-23081 | 41.591003 | -76.674953 |
| SGL-12 B North 1H | Bradford | Overton | 37-015-23299 | 41.589275 | -76.684858 |
| SGL-12 B North 3H | Bradford | Overton | 37-015-23301 | 41.589300 | -76.684642 |
| SGL-12 B South 1H | Bradford | Overton | 37-015-23302 | 41.589289 | -76.684750 |
| SGL-12 B South 3H | Bradford | Overton | 37-015-23304 | 41.592817 | -76.700622 |
| SGL-12 C East 3H | Bradford | Leroy | 37-015-23332 | 41.592911 | -76.700550 |
| SGL-12 C East 4H | Bradford | Leroy | 37-015-23351 | 41.592767 | -76.700656 |
| SGL-12 C West 3H | Bradford | Leroy | 37-015-23333 | 41.590411 | -76.717925 |
| SGL-12 D East 3H | Bradford | Leroy | 37-015-23362 | 41.590617 | -76.717683 |
| SGL-12 D East 4H | Bradford | Leroy | 37-015-23338 | 41.590453 | -76.717875 |
| SGL-12 D West 1H | Bradford | Leroy | 37-015-23339 | 41.590494 | -76.717828 |
| SGL-12 D West 3H | Bradford | Leroy | 37-015-23363 | 41.590575 | -76.717731 |
| SGL-12 D West 4H | Bradford | Leroy | 37-015-23362 | 41.590533 | -76.717778 |
| Signore North 4H | Sullivan | Elkland | 37-113-20337 | 41.548636 | -76.649372 |
| Signore North 5H | Sullivan | Elkland | 37-113-20338 | 41.548647 | -76.649406 |
| Warburton North 1H | Sullivan | Forks | 37-113-20348 | 41.542039 | -76.533111 |
| Yoder 2H | Bradford | Leroy | 37-015-23305 | 41.679022 | -76.675156 |
| Yoder 3H | Bradford | Leroy | 37-015-23306 | 41.679064 | -76.675158 |
| Yonkin 1H | Sullivan | Cherry | 37-113-20358 | 41.545869 | -76.426992 |
| Yonkin 3H | Sullivan | Cherry | 37-113-20359 | 41.548689 | -76.426919 |
| Yonkin B-1H | Sullivan | Cherry | 37-113-20361 | 41.530217 | -76.410906 |

^(a) An initial Subpart OOOOa report was previously submitted for these wells. Chief has included these gas well facilities again to meet the annual reporting requirements of 40 CFR Part 60, Subpart OOOOa.

(iv) Certification by responsible official of truth, accuracy, and completeness:

I certify that I am a certifying official as that term is defined in 40 CFR §60.5430a. I further certify, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.

Responsible Official:

Tyler Berkley

Title:

Regulatory Coordinator

Signature:

Tyler Berkley

Date:

10/25/19

Records for Well Affected Facilities [40 CFR §60.5420a(b)(2)]

(i) Records for each well completion operation:

Attachment A provides a compilation of each well completion operation conducted during the reporting period, as detailed in 40 CFR §60.5420a(c)(1)(i) through (iv), for each new gas well affected facility summarized in Table 1. In accordance with 40 CFR §60.5375a(b), Chief completed the logs on a daily basis for the duration of each well completion operation, recording operations for only the days that activities were performed (i.e., days of inactivity are not included in the logs). Well completion logs for gas well affected facilities subject to subsequent annual reporting requirements, as summarized in Table 2, were included in a previous submittal.

(ii) Records of deviations:

In accordance with 40 CFR §60.5420a(c)(1)(ii), there were no deviations during the reporting period, as detailed in Attachment A.

(iii) Records specified in 40 CFR §60.5420a(c)(1)(vii), if applicable, that support a determination under 40 CFR §60.5432a that the well affected facility is a low pressure well as defined in 40 CFR §60.5430a:

The Chief affected gas well facilities, summarized in Table 1 and Table 2, do not meet the definition of a low pressure well, as defined in 40 CFR §60.5430a.

Records for Fugitive Emissions Components Affected Facilities [40 CFR §60.5420a(b)(7)]

(i) Records for each monitoring survey conducted for the collection of fugitive emissions components at each well site:

Attachment B provides the required records for each monitoring survey conducted for the collection of fugitive emissions components at each well site, as specified in 40 CFR §§60.5420a(b)(7)(i) – (xii).

Subpart OOOOa Requirements Not Applicable to Chief [40 CFR §§60.5420a(b)(3) through (6), (8) through (10), and (12), 60.5422a and 60.5423a]

Chief has determined that the requirements specified at 40 CFR §§60.5420a(b)(3) through (6), (8) through (10), and (12), 60.5422a and 60.5423a are not applicable to Chief's natural gas production well sites. Details of these non-applicability determinations are provided hereafter.

**STATEMENTS OF NON-APPLICABILITY OF
OTHER POTENTIALLY AFFECTED SUBPART OOOOa FACILITIES**

Compressors

40 CFR §§60.5420a(b)(3) and (4) specify reporting requirements for affected centrifugal and reciprocating compressors, respectively.

I. Regulatory Background

Pursuant to 40 CFR §§60.5365a(b) and (c), a centrifugal compressor affected facility and reciprocating compressor affected facility, for which construction, modification, or reconstruction commenced after September 18, 2015, are defined as follows:

- Each centrifugal compressor affected facility, which is a single centrifugal compressor using wet seals. A centrifugal compressor located at a well site, or an adjacent well site and servicing more than one well site, is not an affected facility under this subpart.
- Each reciprocating compressor affected facility, which is a single reciprocating compressor. A reciprocating compressor located at a well site, or an adjacent well site and servicing more than one well site, is not an affected facility under this subpart.

II. Compliance Approach

In accordance with 40 CFR §60.5430a, Chief owns and operates natural gas production well sites that meet the definition of a well site. Chief owns and operates reciprocating compressors at some of its well sites. Pursuant to 40 CFR §§60.5365a(b) and (c), a centrifugal compressor and/or reciprocating compressor located at a well site is not considered an affected facility and therefore is not subject to the requirements of 40 CFR Part 60, Subpart OOOOa. Based upon the information presented above, Chief does not currently own or operate affected centrifugal compressors or reciprocating compressors.

Pneumatic Controllers

40 CFR §60.5420a(b)(5) specifies reporting requirements for affected pneumatic controller facilities.

I. Regulatory Background

Pursuant to 40 CFR §60.5365a(d)(1), a pneumatic controller affected facility, which is not located at a natural gas processing plant, is a single continuous bleed natural gas-driven pneumatic controller operating at a natural gas bleed rate greater than 6 standard cubic feet per hour (scfh) for which construction, modification or reconstruction commenced after September 18, 2015. As stated in the compressors section above, Chief's operations are defined by Subpart OOOOa as well sites.

II. Compliance Approach

Chief owns and operates natural gas-driven pneumatic controllers at its natural gas production well sites. However, Chief's pneumatic controllers do not meet the affected facility criteria specified at 40 CFR §60.5365a(d)(2). The design specifications for Chief's pneumatic controllers specify that they do not continuously bleed. Based upon the information presented above, Chief does not currently own or operate affected pneumatic controllers at their natural gas production well sites. Therefore, the pneumatic controller requirements of Subpart OOOOa do not currently apply to Chief's natural gas production facilities. Manufacturer documentation for pneumatic controllers is maintained by Chief and is available for inspection upon request.

Storage Vessels

40 CFR §60.5420a(b)(6) specifies reporting requirements for affected storage vessel facilities.

I. Regulatory Background

Pursuant to 40 CFR §60.5365a(e), a storage vessel affected facility is a single storage vessel with the potential for volatile organic compound (VOC) emissions equal to or greater than six tons per year (tpy) for which construction, modification or reconstruction commenced after September 18, 2015. In accordance with 40 CFR §60.5430a, a storage vessel is defined as follows:

- Storage vessel means a tank or other vessel that contains an accumulation of crude oil, condensate, intermediate hydrocarbon liquids, or produced water, and that is constructed primarily of nonearthen materials (such as wood, concrete, steel, fiberglass, or plastic) which provide structural support.

Chief owns and operates storage vessels, as defined above, at its natural gas production well sites. In accordance with 40 CFR §60.5365a(e), Chief understands that the potential for VOC emissions from the storage vessels must be calculated using a generally accepted model or calculation methodology, based on the maximum average daily throughput determined for a 30-day period of production prior to the applicable emissions determination deadline specified. Chief also understands that the deadline for determining the potential to emit (PTE) VOC for storage vessels constructed during this reporting period is 30 days after startup.

II. Compliance Approach

Chief has determined the potential VOC emissions from each potentially affected Subpart OOOOa storage vessel constructed during this reporting period to be less than six tpy. Therefore, pursuant to 40 CFR §60.5365a(e), Chief does not currently own or operate any affected storage vessels at their natural gas production well sites.

As part of the Compliance Demonstration under Exemption No. 38, Chief previously submitted VOC emissions estimates to PADEP for potentially affected storage vessels that included the calculation methodology and documented the non-applicability of

Subpart OOOOa. Documentation of the storage vessel applicability determination is also maintained by Chief, and is available for inspection upon request.

Pneumatic Pumps

40 CFR §60.5420a(b)(8) specifies reporting requirements for affected pneumatic pump facilities.

I. Regulatory Background

Chief's operations are defined by Subpart OOOOa as well sites. Pursuant to 40 CFR §60.5365a(h)(2), a pneumatic pump affected facility located at a well site is a single natural gas-driven diaphragm pump for which construction, modification or reconstruction commenced after September 18, 2015.

A natural gas-driven diaphragm pump, as defined in 40 CFR §63.5430a, is a positive displacement pump powered by pressurized natural gas that uses the reciprocating action of flexible diaphragms in conjunction with check valves to pump a fluid. A pump in which a fluid is displaced by a piston driven by a diaphragm is not considered a diaphragm pump for purposes of this subpart. A single natural gas-driven diaphragm pump that is in operation less than 90 days per calendar year is not an affected facility provided the owner/operator keeps records of the days of operation each calendar year and submits the records to the U.S. EPA Administrator (or delegated enforcement authority) upon request. Any period of operation during a calendar day counts toward the 90-calendar day threshold.

II. Compliance Approach

Chief owns and operates natural gas-driven diaphragm pumps at its natural gas production well sites. However, Chief's pneumatic pumps do not meet the affected facility criteria specified at 40 CFR §60.5365a(h)(2). Specifically, Chief's pneumatic pumps do not operate more than 90 days per calendar year. Based upon the information presented above, Chief does not own or operate affected pneumatic pumps at their natural gas production well sites. Therefore, the pneumatic pump requirements of Subpart OOOOa do not currently apply to Chief's natural gas production facilities. Chief maintains records of operation for each pneumatic pump. Documentation of operating days for each pneumatic pump is available for inspection upon request.

Closed Vent Systems

40 CFR §60.5420a(b)(12) specifies reporting requirements for closed vent systems.

I. Regulatory Background

40 CFR §60.5411a(d) specifies closed vent systems requirements for centrifugal compressor wet seal fluid degassing systems, reciprocating compressors, pneumatic pumps and storage vessels using a control device or routing emissions to a process. Owners/operators must conduct an assessment to document that the closed vent system is of sufficient design and capacity to ensure that all emissions from the affected facility are routed to the control device and that the control device is of sufficient design and

capacity to accommodate all emissions from the affected facility. The assessment must be certified by a qualified professional engineer.

II. Compliance Approach

Chief does not own or operate any of the affected facilities for which closed vent systems requirements are specified in Subpart OOOOa. Chief does not use a control device or route emissions to a process for any of its affected facilities. Therefore, the closed vent systems requirements of Subpart OOOOa do not apply to Chief's natural gas production facilities.

Because Chief does not use a control device to comply with the applicable requirements of Subpart OOOOa, the requirement to conduct a performance test in accordance with 40 CFR §60.8 does not apply. Therefore, the performance test reporting requirements codified at 40 CFR §§60.5420a(b)(9) and (10) do not apply to Chief's natural gas production facilities.

Process and Sweetening Units

40 CFR §§60.5422a and 60.5423a specify reporting and additional recordkeeping requirements for process and sweetening units.

I. Regulatory Background

Pursuant to 40 CFR §§60.5365a(f) and (g), and as defined further in 40 CFR §60.5430a, a process unit affected facility and sweetening unit affected facility (for which construction, modification or reconstruction commenced after September 18, 2015), are defined as follows:

- The group of all equipment within a process unit.
 - Process unit means components assembled for the extraction of natural gas liquids from field gas, the fractionation of the liquids into natural gas products, or other operations associated with the processing of natural gas products. A process unit can operate independently if supplied with sufficient feed or raw materials and sufficient storage facilities for the products.
- Sweetening units located at onshore natural gas processing plants that process natural gas produced from either onshore or offshore wells.
 - Sweetening unit means a process device that removes hydrogen sulfide and/or carbon dioxide from the sour natural gas stream.

II. Compliance Approach

Chief's operations do not include natural gas processing. Chief does not own or operate a process or sweetening unit. Thus, the process and sweetening unit requirements of Subpart OOOOa do not apply to Chief's natural gas production facilities.